

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : No. 1:21-CR- 329  
:   
v. : (Judge CONNER )  
:   
JOSE RAMON ADORNO, JR., :   
:   
Defendant. :

**FILED**  
HARRISBURG, PA

OCT 27 2021

**INDICTMENT**

THE GRAND JURY CHARGES:

PER IBA  
DEPUTY CLERK

**COUNT 1**

18 U.S.C. § 922(a)(1)(A)  
(Dealing in Firearms Without a License)

From on or about August 6, 2019 and continuing to on or about  
September 21, 2021, in Dauphin County, within the Middle District of  
Pennsylvania, and elsewhere, the defendant,

**JOSE RAMON ADORNO, JR.,**

not being licensed importer, licensed manufacturer, or licensed dealer,  
did knowingly and willfully engage in the business of dealing in  
firearms without a license.

All in violation of Title 18, United States Code, Section  
922(a)(1)(A).

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE:

**FORFEITURE ALLEGATION**

1. The allegation contained in Count 1 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 922(a)(1)(A) as set forth in Count 1 of this Indictment, the defendant,

**JOSE RAMON ADORNO, JR.,**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

- a. a Glock, model 23, .40 caliber, S/N: TFK512;
- b. Glock, model 27, .40 Cal pistol, S/N: ABNA399;
- c. a Tanfoglio, model WITNESS, 45. caliber, S/N: AE86960;
- d. a S&W, SW40VE, .40 caliber, S/N: RBJ1334;

- e. a Glock, model 30Gen4, .45 caliber, S/N: BKMF689;
- f. a SAR Arms, SAR9, 9mm, S/N T1102-19BV09809;
- g. Taurus model G2C, 9mm pistol, S/N: ABE616905; and
- h. a SAR Arms, SAR9, 9mm, S/N: T1102-20BV85078.

3. If any of the property described above, as a result of any act or omission of the defendant:

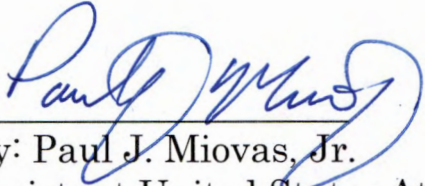
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as

incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c).

BRUCE BRANDLER  
Acting United States Attorney

A handwritten signature in blue ink, appearing to read "Paul J. Miovas, Jr.", is written over a horizontal line.

By: Paul J. Miovas, Jr.  
Assistant United States Attorney

A TRUE BILL:



10/27/2021  
Date